

RECEIVED

MAY 22 2007

**FEDERAL PUBLIC DEFENDER
DISTRICT OF DELAWARE**

704 King Street, Suite 110
Wilmington, Delaware 19801
Phone (302) 573-6010
FAX (302) 573-6041
www.fpdde.org

Edson A. Bostic
Federal Public Defender

Eleni Kousoulis
Christopher S. Koyste
Assistant Federal Public Defenders

Tieffa Harper
Research & Writing Specialist

May 22, 2007

Honorable Joseph J. Farnan, Jr.
United States District Court
J. Caleb Boggs Federal Building
844 King Street
Wilmington, DE 19801

Re: *United States v. Fredy Estuardo-Velasquez*
Criminal Action No.: 07-11-JJF
Our File No.: 2007-00089

Dear Judge Farnan:

Kindly accept this letter in lieu of a formal motion to join into Defendant's Motion for Continuance in the above-captioned matter.

Last week, Counsel raised with the Court that Mr. Estuardo-Velasquez had filed a *pro se* motion to postpone trial for sixty (60) days. At that time, the Court directed Counsel to again discuss with Mr. Estuardo-Velasquez his constitutional rights to a speedy trial and the impact that this motion, if granted, would have on his speedy trial rights.

Accordingly, on May 17, 2007, Counsel met with Mr. Estuardo-Velasquez regarding his speedy trial rights and his *pro se* motion. During that meeting, Mr. Estuardo-Velasquez informed Counsel that he wished to waive his rights, and directed Counsel to join in the Motion for Continuance.

Wherefore, Counsel hereby joins Defendant's Motion for Continuance, and Counsel respectfully requests that this Court grant the motion.¹

Respectfully submitted,

Edson A. Bostic, MNH

Edson A. Bostic
Federal Public Defender

EAB/lmo

cc: Ilana H. Eisenstein, Assistant United States Attorney
Fredy Estuardo-Velasquez, Defendant

¹The government has been informed of the motion and does not oppose this request.